UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In Re:
Stephen W Schmitt
Karen K Schmitt,
Debtors.

Case No. 17-50638
Chapter 13
Judge C. Kathryn Preston

DEBTORS' REPLY TO CREDITOR'S OBJECTION TO CHAPTER 13 PLAN

Now come the Debtors Stephen W. Schmitt and Karen K. Schmitt, by and through counsel hereby reply to Creditor's Objection to their Chapter 13 Plan.

Capital One Auto Finance, a division of Capital One, N.A. ('Creditor') filed an Objection to Debtors' proposed Chapter 13 Plan. In the objection, the Creditor objects to the value of the Debtors' 2007 FORD FREESTAR VIN - 2FMZA51687BA06055 ("Vehicle") supported by Creditor's Exhibit "A – NADA." Creditor's Exhibit A-NADA lists eight Optional Equipment/Adjustments, each of which increase the value of the Vehicle, however, Debtors' vehicle has none of those listed Optional Equipment features. Perhaps, if one counts the roof rails on the vehicle as an optional, full "luggage rack," one of the eight Optional Equipment features may apply. The other seven Optional Equipment features are not included on Debtors' vehicle whatsoever. In addition to lacking the seven (or eight) Optional Equipment features listed, Debtors' vehicle has over 100,000 miles and is well worn.

Wherefore, Debtor requests that the secured value of the vehicle be set at the NADA average Trade-In value of $2,425.00, reflecting the value of the Vehicle as configured, adequately protecting the Creditor's interest in said Vehicle and that their Chapter 13 Plan be confirmed.

/s/ Michael T. Gunner
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Debtor's Reply to Creditor's Objection was served either electronically at the e-mail addresses registered with the Court's ECF System or by regular U.S. mail postage pre-paid this 24th day of March, 2017, upon the parties listed below.

/s/ Michael T. Gunner
Michael T. Gunner (0002078)
Attorney for Debtors

Serve electronically upon:

United States Trustee
Frank M. Pees, Chapter 13 Trustee

Served by regular U.S. mail postage pre-paid:

Stephen W Schmitt
Karen K Schmitt
5952 Rangeline Rd.
Mount Vernon, OH 43050
Debtors